1 Honorable Barbara J. Rothstein 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 RHONDA BROWN, BARRY LONG, KRIS NAPPER and TREVER BACHER, 10 No. 2:23-CV-00951 Plaintiffs, 11 STIPULATED MOTION FOR LEAVE v. 12 TO AMEND COMPLAINT AND ORDER 13 REPUBLIC PARKING NORTHWEST, LLC and REPUBLIC PARKING SYSTEM, LLC, 14 Defendants. 15 16 Pursuant to Fed. R. Civ. P. 15(a)(2), the parties jointly submit this Stipulated Motion for 17 Leave to Amend Complaint. 18 This stipulation follows the parties' August 14, 2023 telephonic meet and confer, where 19 Defendants Republic Parking Northwest, LLC and Republic Parking System, LLC identified 20 issues to be addressed by their forthcoming Motion to Dismiss Pursuant to Fed. R. Civ. P. 21 22 12(b)(1). 23 The parties stipulate to the following filing deadlines and briefing schedule: 24 August 17, 2023: Amended Complaint 25 August 31, 2023: Defendants' Deadline to File a Responsive Pleading 26 STIPULATED MOTION FOR LEAVE TO AMEND COMPLAINT KELLER ROHRBACK L.L.P. 1201 Third Avenue, Suite 3200 Seattle, WA 98101-3052 TELEPHONE: (206) 623-1900 FACSIMILE: (206) 623-3384 AND ORDER (2:23-CV-00951) - 1

1 The parties respectfully request that the Court grant leave for Plaintiffs to file the 2 Amended Complaint and for Defendants to respond. 3 RESPECTFULLY SUBMITTED this 16th day of August, 2023. 4 KELLER ROHRBACK L.L.P. BENESCH, FRIEDLANDER, COPLAN & 5 **ARONOFF LLP** 6 By: *s/Benjamin J. Lantz* By: s/ Adam E. Primm (email permission) 7 By: s/ Nathan L. Nanfelt Adam E. Primm, Pro Hac Vice Benjamin J. Lantz, WSBA #25057 W. Eric Baisden, Pro Hac Vice Pending 8 Nathan L. Nanfelt, WSBA #45273 127 Public Square, Suite 4900 1201 Third Avenue, Suite 3200 Cleveland, OH 44114 9 Seattle, WA 98101 Phone: (216) 363-4500 Phone: (206) 623-1900 10 Email: blantz@kellerrohrback.com Email: aprimm@beneschlaw.com Email: nnanfelt@kellerrohrback.com Email: ebaisden@beneschlaw.com 11 12 WASHINGTON CIVIL & DISABILITY David R. West, WSBA #13680 Audrey Chambers, WSBA #53625 **ADVOCATE** 13 FOSTER GARVEY P.C. By: s/ Conrad Reynoldson 111 Third Avenue, Ste. 3000 14 By: s/ Marielle Maxwell Seattle, WA 98101-3296 Conrad Reynoldson, WSBA #48187 Phone: (206) 447-4400 15 Marielle Maxwell, WSBA #54957 Email: david.west@foster.com 16 Email: audrey.chambers@foster.com 4115 Roosevelt Way NE, Ste. B Seattle, WA 98105-6473 17 Attorneys for Defendant Phone: (206) 876-8515 Email: conrad@wacda.com 18 Email: marielle@wacda.com 19 Attorneys for Plaintiffs 20 21 22 23 24 25 26

1 ORDER 2 The parties having stipulated to the above, it is the motion is HEREBY GRANTED. It is 3 FURTHER ORDERED that the parties shall file the proposed Amended Complaint and briefing 4 as follows: 5 August 17, 2023: Amended Complaint 6 August 31, 2023: Defendants' Deadline to File a Responsive Pleading 7 IT IS ORDERED. 8 9 Dated: August 16, 2023. 10 Barbara & Rothetein 11 Barbara Jacobs Rothstein 12 U.S. District Court Judge 13 14 Submitted by: 15 KELLER ROHRBACK L.L.P. 16 Benjamin J. Lantz, WSBA #25057 17 Nathan L. Nanfelt, WSBA #45273 1201 Third Avenue, Suite 3200 18 Seattle, WA 98101 Telephone: (206) 623-1900 19 Email: blantz@kellerrohrback.com Email: nnanfelt@kellerrohrback.com 20 21 Conrad Reynoldson, WSBA #48187 Marielle Maxwell, WSBA #54957 22 WASHINGTON CIVIL & DISABILITY ADVOCATE 4115 Roosevelt Way NE, Ste. B 23 Seattle, WA 98105-6473 Telephone: (206) 876-8515 24 Email: conrad@wacda.com 25 Email: marielle@wacda.com 26 Attorneys for Plaintiffs STIPULATED MOTION FOR LEAVE TO AMEND COMPLAINT KELLER ROHRBACK L.L.P. 1201 Third Avenue, Suite 3200 Seattle, WA 98101-3052 TELEPHONE: (206) 623-1900 FACSIMILE: (206) 623-3384 AND ORDER (2:23-CV-00951) - 3

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